

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY et al.,

Defendants.

CASE NO. 7:20-CV-00947-DCC

REPLY DECLARATION OF MARC E. MAYER

I, Marc E. Mayer, hereby declare as follows:


1. I am an attorney at law, duly licensed to practice law in the State of California. I have been admitted on a *pro hac vice* basis to practice before this Court in connection with this matter. I am, through my professional corporation, a partner of the law firm Mitchell Silberberg & Knupp LLP, counsel of record for Defendants MG Freesites Ltd. and Mindgeek S.à r.l. (together, “Defendants”) in this action. I make the following reply declaration in further support of Defendants’ Motion to Compel certain of the Plaintiffs in this action to appear for an independent mental evaluation pursuant to Rule 35 of the Federal Rules of Civil Procedure. I make all of the following statements of my own personal knowledge and, if called as a witness, could and would testify competently thereto.

2. On April 11, 2024, my colleague Emily Evitt took the deposition of Jane Doe 4 in this action. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the transcript from Doe 4’s deposition.

3. On April 15, 2024, Ms. Evitt took the deposition of Jane Doe 6 in this action. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the transcript from Doe 6's deposition.¹

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 14th day of June, 2024 at Los Angeles, California.



Marc E. Mayer

¹ Because Plaintiffs have designated their deposition transcripts as confidential, Defendants have filed Exhibits A and B under seal, and contemporaneously filed a Motion to Seal with the Court.

EXHIBIT A
(FILED UNDER SEAL)

EXHIBIT B
(FILED UNDER SEAL)